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August 8, 2000

Stuart L. Nightingale, M.D.

Office of the Assistant Secretary for Planning and Evaluation
Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C. 20101

Dear Dr. Nightingale:

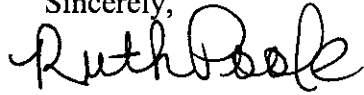
This statement from the Association of Independent Research Institutes is intended to address the issues to be discussed at the Conference on Human Subject Protection and Financial Conflict of Interest on August 15-16, 2000.

The Association of Independent Research Institutes (AIRI) is a nationwide association of 87 non-profit independent research institutes conducting peer-reviewed basic and applied research in the biomedical and behavioral sciences. AIRI institutions are distinct from other organizations involved in research, such as universities, hospitals, and for-profits, in their organization, mission, and size. They are independent; their primary mission is research; and they tend to be relatively small in size with budgets from less than one million dollars to several tens of millions of dollars. AIRI institutes receive 11% of NIH extramural research awards. More than 50 percent of the association's members conduct human subject research.

AIRI welcomes the willingness of the Department of Health and Human Services (DHHS) to undertake an extensive public consultation with researchers and research institutions to identify improved means to manage financial conflicts of interest that could undermine public confidence in the objectivity of research results. AIRI is also dedicated to working with the National Institutes of Health on compliance with its recently released regulations requiring that all clinical investigators, research administrators, institutional review boards members and staff receive appropriate human subjects research training.

Key AIRI representatives will attend the two-day session on financial conflict of interest. On behalf of AIRI, I thank you again for this opportunity to participate in this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Ruth Poole". The signature is fluid and cursive, with the first name "Ruth" and last name "Poole" clearly distinguishable.

Ruth Poole
President, AIRI